Remarks

[0001]   Herein, the "Action" or "Office Action" refers to the final Office Action dated May 3, 2007.

[0002]   Applicant respectfully requests reconsideration and allowance of all pending claims of the application. Claims 1-8, 10-22, 24-26, 28-34, and 36-37 are presently pending. Claims amended herein are 1, 19, 25, and 29. Claims withdrawn or canceled herein are 9, 27, and 35. New claims added herein are None.

[0003]   Applicant's amendments and remarks after Final are appropriate under 37 C.F.R. §1.116 because they address the Office's remarks in the Final Action, and thus could not have been presented earlier. In addition, the amendments and remarks should be entered to place the case in better form for appeal.

Substantive Claim Rejections

35 USC § 102 Claim Rejections

[0004]   Claims 1-3, 6-9, 11, 12-13, 17-18, 25-27, 29-33, and 35-36 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,732,105 to Watson, Jr. et al. (hereinafter, "Watson") (*Office Action* p. 2).

[0005]   Applicant notes that claims 9, 27, and 35 are canceled herein, and accordingly the rejection of these claims is moot. Applicant

respectfully traverses the remaining §102 rejections, and requests reconsideration and allowance in light of the comments and amendments contained herein. Accordingly, Applicant requests that the rejections be withdrawn and that the case be passed along to issuance.

[0006]   **Claim 1** recites a method comprising:

> receiving a request for an internal web page from an external browser application;
> identifying link information contained in the request for the internal web page;
> storing the link information which has been identified in a link translation table;
> identifying at least one internal link in the internal web page;
> modifying the at least one internal link based on the link information stored in the link translation table, such that the internal link is accessible by the external browser application; and
> communicating the requested web page, including the modified internal link, to the external browser application.

[0007]   In order for Watson to anticipate this claim, Applicant submits that Watson must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim. Applicant respectfully submits that Watson does not disclose all of the claimed elements and features of claim 1. For example, Watson does not show or disclose "identifying link information contained in the request for

the internal web page" and then "storing the link information which has been identified in a link translation table", as recited in claim 1.

[0008]   Instead, Watson describes that "[k]eywords are used to determine if a link targets the Intranet or the Internet" and "[w]hen the rewriter 604 sees a link that targets the Intranet 508, it looks to keyword table 608 to match the path of the link's URL to the appropriate table URL to rewrite the link with" (*Watson*, col.7 lns.37-40, col.9 lns.15-18). Simply stated, Watson describes referencing a keyword table to rewrite the link. However, Watson does not show or disclose "identifying link information contained in the request for the internal web page" and then "storing the link information which has been identified in a link translation table", as recited in claim 1.

[0009]   Further, since Watson does not show or disclose "storing the link information which has been identified in a link translation table", it clearly cannot show or disclose "modifying the at least one internal link based on the link information stored in the link translation table", as recited in claim 1.

[0010]   Accordingly, claim 1 is allowable over Watson for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

[0011]   **Claim 2, 3, 6-8, and 11** are allowable by virtue of their dependency (either directly or indirectly) upon claim 1. Additionally, one

or more of claims 2, 3, 6-8, and 11 may be allowable over Watson for independent reasons.

[0012]   **Claim 12** recites a method comprising:

> receiving a request for an internal web page from an external source;
> identifying link information contained in the request for an internal web page;
> storing the identified link information in a link translation table;
> retrieving the internal web page;
> translating any internal links in the internal web page such that the internal links are accessible by the external source; and
> communicating the internal web page, including the translated internal links, to the external source.

[0013]   In order for Watson to anticipate this claim, Applicant submits that Watson must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim. Applicant respectfully submits that based on reasoning similar to that discussed above in response to the rejection of claim 1, Watson does not disclose all of the claimed elements and features of claim 12. For example, Watson does not show or disclose "storing the identified link information in a link translation table", as recited in claim 12. For the sake of brevity, Applicant has not repeated all of the arguments.

[0014] Accordingly, claim 12 is allowable over Watson for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

[0015] **Claims 13, 17 and 18** are allowable by virtue of their dependency upon claim 12 (either directly or indirectly). Additionally, some or all of claims 13, 17 and 18 may be allowable over Watson for independent reasons.

[0016] **Claim 25** recites one or more computer-readable media having stored thereon a computer program that, when executed by one or more processors, causes the one or more processors to:

> receive a request for an internal web page via a public network;
> retrieve the requested internal web page;
> identify link information contained in the request for the internal web page;
> store the link information which has been identified in a link translation table;
> determine whether the internal web page contains any internal links;
> if the internal web page contains at least one internal link:
> modify the at least one internal link based on the link information stored in the link translation table, such that the internal link is accessible via the public network; and
> generate data representing the requested internal web page, wherein the generated data includes the modified internal link.

Serial No.: 10/738,362
Atty Docket No.: MS1-1871US
RESPONSE TO FINAL OFFICE ACTION DATED 05/03/2007
-17-
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[0017]   In order for Watson to anticipate this claim, Applicant submits that Watson must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim. Applicant respectfully submits that based on reasoning similar to that discussed above in response to the rejection of claim 1, Watson does not disclose all of the claimed elements and features of claim 25.   For example, Watson does not show or disclose computer-readable media having stored thereon a computer program that, when executed by one or more processors, causes the one or more processors to "store the link information which has been identified in a link translation table" and then "if the internal web page contains at least-one internal link: modify the at least one internal link based on the link information stored in the link translation table", as recited in claim 25. For the sake of brevity, Applicant has not repeated all of the arguments.

[0018]   Accordingly, claim 25 is allowable over Watson for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

[0019]   **Claims 26 and 27** are allowable by virtue of their dependency upon claim 25 (either directly or indirectly). Additionally, one or both of claims 26 and 27 may be allowable over Watson for independent reasons.

[0020] **Claim 29** recites an apparatus comprising:

       means for receiving a request for a web page associated with an internal network;

       means for identifying link information contained in the request for the web page associated with the internal network;

       means for storing the link information which is identified in a link translation table; and

       means for translating internal links contained in the web page based on the link information stored in the link translation table, wherein the internal links are accessible via the internal network, and wherein the means for translating translates any internal links contained in the web page into external links that are accessible via an external network.

[0021] In order for Watson to anticipate this claim, Applicant submits that Watson must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim. Applicant respectfully submits that based on reasoning similar to that discussed above in response to the rejection of claim 1, Watson does not disclose all of the claimed elements and features of claim 29. For example, Watson does not show or disclose an apparatus comprising "means for storing the link information which is identified in a link translation table" and a "means for translating internal links contained in the web page based on the link information stored in the link translation table", as recited in claim 29. For the sake of brevity, Applicant has not repeated all of the arguments.

Serial No.: 10/738,362
Atty Docket No.: MS1-1871US
RESPONSE TO FINAL OFFICE ACTION DATED 05/03/2007
-19-
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[0022]   Accordingly, claim 29 is allowable over Watson for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

[0023]   **Claims 30-33, 35, and 36** are allowable by virtue of their dependency upon claim 29 (either directly or indirectly). Additionally, one or more of claims 30-33, 35, and 36 may be allowable over Watson for independent reasons.

35 USC § 103 Claim Rejections

[0024]   Claims 4-5, 34, and 37 stand rejected under 35 U.S.C. §103(a) as being obvious over of Watson in view of U.S. Patent Application Publication No. 2004/0111491 to Raja et al. (hereinafter "Raja")(*Office Action*, p.13).

[0025]   Claims 10 and 16 stand rejected under 35 U.S.C. §103(a) as being obvious over Watson in view of U.S. Patent No. 5,937,404 to Csaszar et al. (hereinafter "Csaszar")(*Office Action*, p.16).

[0026]   Claims 14, 15, and 28 stand rejected under 35 U.S.C. §103(a) as being obvious over Watson in view of U.S. Patent No. 6,397,259 to Lincke et al. (hereinafter "Lincke")(*Office Action*, p.17).

[0027]   Claims 19-22 stand rejected under 35 U.S.C. §103(a) as being obvious over Watson in view of U.S. Patent No. 5,761,683 to Logan et al. (hereinafter "Logan")(*Office Action*, p.19).

[0028]   Claims 19-22 stand rejected under 35 U.S.C. §103(a) as being obvious over Watson in view of U.S. Patent Publication No. 2003/0172050 to Decime et al. (hereinafter "Decime")(*Office Action*, p.22).

[0029]   Claim 24 stands rejected under 35 U.S.C. §103(a) as being obvious over Watson in view of Logan and further in view of Lincke (*Office Action*, p.26).

[0030]   Claim 24 stands rejected under 35 U.S.C. §103(a) as being obvious over Watson in view of Decime and further in view of Lincke (*Office Action*, p.26).

[0031]   Applicant respectfully traverses each of the §103 rejections, and requests reconsideration and allowance in light of the comments and amendments contained herein. Accordingly, Applicant requests that the rejections be withdrawn and that the case be passed along to issuance.

[0032]   **Claim 19** recites a system comprising:

a link translation table, wherein the link translation table contains stores link information which has been identified in a request for an internal link, and includes mappings of portions of links between internal links and external links, wherein internal links are accessible by an internal device coupled to an internal network and external links are accessible by an external device coupled to an external network; and

a translation module coupled to the link translation table, wherein the translation module is to receive a request for an internal web page and to identify any internal links in the requested internal web page, wherein the translation module further modifies any internal links using data contained in the link translation table and generates the requested web page data, including the modified internal links, for communication to a source of the internal web page request.

[0033]   In making out the rejection of this claim, the Office argues that Watson discloses all of the elements of claim 19, except that Watson does explicitly disclose a link translation table, wherein the link translation table contains link information including mappings of portions of links between internal links and external links, wherein internal links are accessible by an internal device coupled to an internal network and external links are accessible by an external device coupled to an external network (*Office Action*, p.21). The Office then argues that Logan cures the deficiencies of Watson, and indicates that Logan discloses a lookup table that contains remote URLs and local storage URLs (*Office Action*, p.21).

[0034]   Applicant submits that Watson and/or Logan do not teach or suggest the combination of features recited in amended claim 19. For example, the Watson-Logan combination does not teach or suggest, "a link translation table, wherein the link translation table stores link information which has been identified in a request for an internal link", as recited in claim 19.

[0035]   As described above in response to the §102 rejection of claim 1, Watson describes that "[k]eywords are used to determine if a link targets the Intranet or the Internet" and "[w]hen the rewriter 604 sees a link that targets the Intranet 508, it looks to keyword table 608 to match the path of the link's URL to the appropriate table URL to rewrite the link with" (*Watson*, col.7 lns.37-40, col.9 lns.15-18). Simply stated, Watson describes referencing a keyword table to rewrite the link. However, Watson does not describe "a link translation table, wherein the link translation table stores link information which has been identified in a request for an internal link", as recited in claim 19.

[0036]   Logan fails to cure the deficiencies or Watson, as Logan does not teach or suggest "a link translation table, wherein the link translation table stores link information which has been identified in a request for an internal link", as recited in claim 19. Instead, Logan describes discloses a lookup table that contains remote URLs and local storage URLs (*Office Action*, p.21).

[0037] Accordingly, claim 19 is allowable over the Watson-Logan combination for at least these reasons, and Applicant respectfully requests that the §103 rejection be withdrawn.

[0038] **Claims 20-22** are allowable over the Watson-Logan combination by virtue of their dependency upon claim 21 (either directly or indirectly). Additionally, some or all of claims 20-22 may also be allowable over the Watson-Logan combination for independent reasons.

[0039] **Claim 19** also stand rejected under 35 U.S.C. §103(a) as being obvious over Watson in view Decime. In making out this rejection, the Office argues that Watson discloses all of the elements of claim 19, except that Watson does explicitly disclose a link translation table, wherein the link translation table contains link information including mappings of portions of links between internal links and external links, wherein internal links are accessible by an internal device coupled to an internal network and external links are accessible by an external device coupled to an external network (*Office Action*, p.21). The Office then argues that Decime cures the deficiencies of Watson, and indicates that Decime discloses "0036 external links 188 (external links) include network page links such as uniform resource locator address that map (map) to network pages located externally outside of network (external devices) site 14" (*Office Action*, p.24).

[0040]   Applicant submits that Watson and/or Decime do not teach or suggest the combination of features recited in amended claim 19.   For example, the Watson- Decime combination does not teach or suggest, "a link translation table, wherein the link translation table stores link information which has been identified in a request for an internal link", as recited in claim 19.

[0041]   As described above in response to the §102 rejection of claim 1, Watson describes that "[k]eywords are used to determine if a link targets the Intranet or the Internet" and "[w]hen the rewriter 604 sees a link that targets the Intranet 508, it looks to keyword table 608 to match the path of the link's URL to the appropriate table URL to rewrite the link with" (*Watson*, col.7 lns.37-40, col.9 lns.15-18).   Simply stated, Watson describes referencing a keyword table to rewrite the link.   However, Watson does not describe "a link translation table, wherein the link translation table stores link information which has been identified in a request for an internal link", as recited in claim 19.

[0042]   Decime fails to cure the deficiencies of Watson, as Decime does not teach or suggest "a link translation table, wherein the link translation table stores link information which has been identified in a request for an internal link", as recited in claim 19.   Instead, Decime describes a lookup table/list of network page links that includes internal and external network links (*Office Action*, p.24).

[0043]   Accordingly, claim 19 is allowable over the Watson-Decime combination for at least these reasons, and Applicant respectfully requests that the §103 rejection be withdrawn.

[0044]   **Claims 20-22** are allowable over the Watson-Decime combination by virtue of their dependency upon claim 21 (either directly or indirectly). Additionally, some or all of claims 20-22 may also be allowable over the Watson-Logan combination for independent reasons.

[0045]   **Claims 4, 5, 10, 14-16, 24, 28, 34, and 37** are rejected under 35 U.S.C. §103(a) as being obvious over Watson in combination with one or more secondary references. Applicant notes that none of claims 4, 5, 10, 14-16, 24, 28, 34, and 37 are independent claims, and that each of these claims ultimately depends from one of the independent claims (*i.e.,* claims 1, 12, 19, 25, and 29). Applicant further notes that it is axiomatic that any dependent claims which depend from an allowable base claim are also allowable, and therefore the Applicant does not believe that it is necessary to present arguments in favor of claims 4, 5, 10, 14-16, 24, 28, 34, and 37 as these claims should be allowable for at least the reasons discussed above in response to rejection of their respective base claims, as well as for their own recited features which are neither shown nor supported by the cited reference. For example:

[0046]   **Claim 4** stands rejected under 35 U.S.C. §103(a) as being obvious over Watson in view Raja. Applicant submits that Watson and/or

Raja do not teach or suggest the combination of features recited in amended claim 4. The Office acknowledges that Watson does not explicitly disclose modifying a port associated with the at least one internal link, and relies on Raja as curing the deficiencies of Watson (*Office Action*, p.13). However, Raja fails to cure the deficiencies of Watson, as Raja does not teach or suggest, "wherein modifying the at least one internal link includes modifying a port associated with the at least one internal link", as recited in claim 4. Instead, Raja describes methods for reducing overhead in reverse proxy servers where a web page need not be parsed for only intranet-accessible URLs (*Raja*, [0049]). The approaches described in Raja can be used in conjunction with processing of properties like window.location, Location.href, Location.hash etc. (Raja, [0051]). However, modifying a port associated with an internal link is not disclosed by Raja.

[0047] __Claim 5__ stands rejected under 35 U.S.C. §103(a) as being obvious over Watson in view Raja. Applicant submits that Watson and/or Raja do not teach or suggest the combination of features recited in amended claim 5. The Office acknowledges that Watson does not explicitly disclose modifying a server name associated with the at least one internal link, and relies on Raja as curing the deficiencies of Watson (*Office Action*, p.14). However, Raja fails to cure the deficiencies of Watson, as Raja does not teach or suggest, "wherein modifying the at least one internal link includes modifying a server name associated with the at least one internal link", as recited in claim 5. Instead, Raja

describes methods for reducing overhead in reverse proxy servers and the approaches for these methods may be used in conjunction with processing of properties like Location.hostname, Location.href, window.location etc. (*Raja*, [0051]). However, modifying a server name associated with an internal link is not explicitly disclosed by Raja.

[0048]   **Claim 14** stands rejected under 35 U.S.C. §103(a) as being obvious over Watson in view Lincke. Applicant submits that Watson and/or Lincke do not teach or suggest the combination of features recited in amended claim 14.   The Office acknowledges that Watson does not explicitly disclose the link translation table including at least one entry defined by a user, and relies on Lincke to cure the deficiencies of Watson (*Office Action*, p.17).   However, Lincke fails to cure the deficiencies of Watson, as Lincke does not teach or suggest, "wherein the link translation table includes at least one entry defined by a user", as recited in claim 14. Instead, Lincke describes a packet minimized communication between a wireless client and a proxy server where the proxy server supports a user database.   The user database reduces the amount of data that is sent between the wireless client and the proxy server (*Lincke*, col.111 lns.24-28).   However, a translation table containing at least one user defined entry is not disclosed in Lincke.

[0049]   **Claim 28** stands rejected under 35 U.S.C. §103(a) as being obvious over Watson in view Lincke. Applicant submits that Watson and/or Lincke do not teach or suggest the combination of features recited in amended claim 28.   The Office acknowledges that Watson does not

Serial No.: 10/738,362
Atty Docket No.: MS1-1871US
RESPONSE TO FINAL OFFICE ACTION DATED 05/03/2007
-28-
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explicitly disclose "wherein the one or more processors further modify the at least on internal link using information contained in a header associated with the received request for an internal web page", and relies on Lincke to cure the deficiencies of Watson (*Office Action*, p.18). However, Lincke fails to cure the deficiencies of Watson, as Lincke does not teach or suggest, "wherein the one or more processors further modify the at least on internal link using information contained in a header associated with the received request for an internal web page", as recited in claim 28. Instead, Lincke describes Compact Transfer Protocol (CTP) requests, and says that every CTP request starts out with a set of common request header fields followed by some request specific fields (*Lincke*, col.66 lns. 25-27). However, modifying a link using information in a header associated with a received request is not disclosed by Lincke.

[0050]   Accordingly, Applicant requests that the §103 rejections be withdrawn and that claims 4, 5, 10, 14-16, 24, 28, 34, and 37 be allowed in the next Action.

Dependent Claims

[0051]   In addition to its own merits, each dependent claim is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each dependent claim where its base claim is allowable.

Conclusion

[0052]   All pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application.   If any issues remain that prevent issuance of this application, the Office is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

Dated: _7-19-2007_   By: _____

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